

NATALIE K. WIGHT, OSB #035576  
United States Attorney  
District of Oregon  
**GAVIN W. BRUCE, OSB #113384**  
Assistant United States Attorney  
[Gavin.Bruce@usdoj.gov](mailto:Gavin.Bruce@usdoj.gov)  
405 East 8th Avenue, Suite 2400  
Eugene, Oregon 97401  
Telephone: (541) 465-6771  
**CAMERON A. BELL, CSB #305872**  
Trial Attorney—Civil Rights Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
[Cameron.Bell@usdoj.gov](mailto:Cameron.Bell@usdoj.gov)  
Telephone: (202) 802-7643  
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLAND DIVISION**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00084-SI**

v.

**STIPULATED MOTION FOR  
PROTECTIVE ORDER**

**TONY DANIEL KLEIN,**

**Defendant.**

The United States hereby moves for an order pursuant to Rule 16(d)(1), Fed. R. Crim. P., to prevent the dissemination or misuse of discovery material containing potentially sensitive or confidential images relating to Coffee Creek Correctional Facility, as further defined in the Stipulated Protective Order. The proposed order was drafted in coordination with the Oregon Department of Justice. Defense counsel joins in this request.

**Stipulated Motion for Protective Order**

**Page 1**  
Revised March 2018

For the reasons stated in the Stipulated Protective Order, the parties respectfully request that the Court enter the proposed Protective Order.

Dated: February 17, 2023

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

/s/ Gavin W. Bruce  
GAVIN W. BRUCE  
Assistant United States Attorney

KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL

/s/ Cameron A. Bell  
CAMERON A. BELL  
Trial Attorney  
Civil Rights Division